

Occidental Chemical Corporation

PAB

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August 2, 1983

Mr. Ernest A. Regna, Chief
Solid Waste Branch
United States Environmental Protection Agency, Region II
26 Federal Plaza
New York, New York 10278

REFERENCE: RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
PART B PERMIT APPLICATION
HYDE PARK LEACHATE AND HANDLING FACILITY
I.D. NO. NYD 000831644

Dear Mr. Regna:

In response to your letter of June 9, 1983, Occidental Chemical Corporation (OCC) is submitting the enclosed document, "Hyde Park Landfill Leachate Storage and Handling Facility, Responses to Comments from EPA/State Dated: May 3, 1983 and June 9, 1983".

This document responds to each of the numbered comments in your Attachment A and also a number of other comments made by EPA and the State of New York pursuant to the Settlement Agreement for this site. Since the additional information and clarifications requested could be of benefit to your branch during the permit approval process, OCC is submitting responses to all comments in a single document.

Your particular comments in Attachment A are cross-referenced in the attached "RCRA Part B Response to Attachment A".

If you have any further questions on this submission, please call me at (716) 286-3600.

Respectfully,

John R. Nichter

J. R. Nichter
Hyde Park Coordinator

REGIONAL HEARING CLERK
REGION II
AUG 16 10 30 AM '83
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

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Enclosure: Hyde Park Landfill Leachate Storage and Handling Facility,
Responses to Comments From EPA/State Dated: May 3, 1983 and
June 9, 1983 (4 copies)



Special Environmental Programs

Hooker Chemical Center, 360 Rainbow Boulevard South, Box 728, Niagara Falls, New York 14302 716/286-3000

NEW YORK, N.Y. 10007
ENVIRONMENTAL PROTECTION
AGENCY
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REGIONAL HEARING CLERK
REGION II

RCRA PART B
RESPONSE TO ATTACHMENT A, RCRA Letter of June 9, 1983
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Item Number in Attachment A	Part B Reference		<u>Response No. in EPA/State Submission</u>
	<u>Document</u>	<u>Page</u>	
(1)			See Responses 54 & 55.
(2)	Vol. I	2512E	See Response 56.
(3)	Vol. I	3	See Response 58.
(4)	Vol. I	6	See Response 2.
(5)	Vol. I	8	See Responses 2 & 64.
(6)	Vol. I	20	See Responses 27, 61, 66, 67, 77 & 78.
(7)	Vol. I	26	See Responses 66 & 68.
(8)	Vol. I	41	See Response 69.
(9)	Vol. I	54	On March 2, 1983 a meeting was held with the following fire companies: 1. Upper Mountain Fire Company 1040 Escarment Drive <u>Lead Agency</u> Lewiston, New York 14092 2. Niagara Active Hose 3995 Lockport Road Niagara Falls, New York 14305 3. Niagara Fire Company #1 6010 Lockport Road Niagara Falls, New York 14305 4. Lewiston Fire Company #1 145 N. 6th Street Lewiston, New York 14092

During the meeting the fire company personnel were given details on the layout of the proposed facility, the properties of the leachate and second phase organics, entrances and roads inside the facility as well as haul routes from the facility to the Niagara Falls treatment facility.

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In addition to the requirements of 40 CFR 264.37 the following were also discussed:

1. Industrial hygiene practices related to the site.
2. Discussion of safety clothing and decontamination.
3. Discussion of "clean-dirty" concepts in relation to injury and transporting to health care facilities.
4. Outlined the general safety regulations at the site to be used during construction and operation of the facility.
5. Emergency procedures to be followed during fire and/or explosion and possible evacuation routes.

It is Occidental's intention to carry out similar meeting with hospitals, the police, emergency response contractors and state emergency response teams.

The Occidental Chemical Corporation's Niagara Falls plant has a rotating emergency coordinator call in list. It consists of responsible personnel in the Environmental Control department and is as follows.

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TABLE 1
 EMERGENCY COORDINATOR CALL IN LIST
 ENVIRONMENTAL CONTROL DEPARTMENT

<u>Name</u>	<u>Home Phone</u>	<u>Business Phone</u>	<u>Address</u>
Barmasse, M.	791-3288	278-6789	2711 N. Lake Rd., Wilson, N.Y. 14172
Dworzanski, G.	751-9271	278-7587	4301 E. Lake Rd., Wilson, N.Y. 14172
Juszkiewicz, J.	631-3039	278-7477	4306 Shimerville Rd., Clarence, N.Y. 14031
Klimecko, R.	297-4082	278-7547	8525 3rd Ave., Niagara Falls, N.Y. 14304
Marasco, J.	297-3704	278-7535	6000 Miller Rd., Niagara Falls, N.Y. 14304
Simmington, R.	694-8754	278-7545	1434 D'Angelo Drive, N. Tonawanda, N.Y. 14120
Skryd, K.	283-0989	278-6789	8422 Frontier Ave., Niagara Falls, N.Y. 14304

(9) Vol. I 63 The following equipment is available for
 use at the facility.

<u>Unit</u>	<u>Qty</u>	<u>Location</u>
Tyvec Coveralls	24 units	Control Room/On-Site
Rain Suits	6 units	Control Room/On-Site
Rubber Work Gloves	24 pairs	Control Room/On-Site
Rubber Boots	6 pairs	Control Room/On-Site
Hard Hats	12 units	Control Room/On-Site
Safety Glasses	12 pairs	Control Room/On-Site
Respirators	24 units	Control Room/On-Site
Fire Extinguishers	6 ABC Type	See Plot Plan Dwg. A-11-17911
Shovels	6 units	Control Room/On-Site
Absorbent Mat'l	6 Bags	Shower Locker Store Room/ On-Site
Safety Van	1 Truck	Niagara Plant, Buffalo Ave.
C.E.R.P Van	1 Truck	Niagara Plant, Buffalo Ave.
Hylift	2 Units	Niagara Plant, Buffalo Ave.
Vacuum Truck	1 Truck	Niagara Plant, Buffalo Ave.
Empty Trailers	2 Units	Niagara Plant, Buffalo Ave.

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The evacuation plan will be modified to include the following signals and evacuation routes.

1. The facility will be equipped with an alarm system that signals, via a horn sound, when any abnormal condition exists.
2. The alarm system will be tied into the Niagara plant emergency 7333 telephone number and activated when an alarm signal goes unanswered at the site.
3. All personnel at the site will have access to a two way radio system for in plant communications.
4. The primary evacuation route will be through the main gate onto Hyde Park Blvd. However if this exit is blocked due to fire, explosion or hazardous chemicals an alternate exit will be onto New Road.

The terms as stated in the original submission will be modified as follows:

Pg. 2409E-56 1. Controllable - Minor fire, mechanical problem, or any disturbance from normal operation that affects the immediate area but in no way threatens human health or the environment.

Pg. 2409E-58 2. Minor - Same as controllable emergency unless the emergency threatens human health or the environment, in which case the minor emergency will be treated as a major emergency and the contingency plan will be activated.

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Pg. 2409E-59

General Procedures

Once a major emergency,
or a minor emergency
which threatens human
health or the environment
has been
declared,.....

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The leachate handling facility will be operated by an Environmental Technician, Matthew Barmasse, who is qualified to act as an emergency coordinator either as the individual at the site during an emergency or as a call in emergency coordinator. During an emergency the Environmental Technician will contact the Environmental Engineer responsible for the Hyde Park facility who will act as the area superintendent. This person is also qualified as an emergency coordinator. The facility will not have a production superintendent per say, however the superintendent of Environmental Control will be notified if required.

The following information will be inserted after Item 3 - Major, located on page 2409E-56.

In making the above assesment the emergency coordinator must define whether or not an emergency condition could endanger the lives or life of individuals at the scene of the emergency. The following guidelines are to be used to determine if life could be endangered.

1. During a fire, explosion or spill, toxic fumes require the use of self contained breathing aparatus.
2. A fire or explosion can not be easily controlled by one person using on-site extinguishers or equipment.

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3. Any time prior to, or during an emergency condition an individual is physically hurt such that emergency medical assistance is required.
4. A spill causes an individual to become drenched or ingests leachate or second phase organics.
5. A spill, fire or explosion that prevents immediate access or egress to or from the site or other control facilities on-site.

In addition to those items listed on pages 59, 60 and 61 the Emergency Actions will be expanded to include the following additional general procedures.

1. To be inserted at the beginning as Item A pg. 2409E-59.
 - a. Activate internal facility alarms or communications to notify all facility personnel.
2. Inserted under d) - 3rd ¶ pg. 2409E-60

The report must include

- i Name and telephone number of reporter
- ii Name and address of the facility
- iii Time and type of incident
- iv Name and quantity of materials involved, to the extent known
- v The extent of the injuries, if any
- vi The possible hazards to human health, or the environment, outside the facility

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3. Inserted at the end of the section pg.
2409E-61

I) The emergency coordinator will
ensure that, in the affected areas
of the facility:

1. No waste that may be
incompatible with the released
material is treated, stored, or
disposed of until cleanup
procedures are completed.

2. All emergency equipment listed
in the contingency plan is
cleaned and fit for its
intended use before operations
are resumed.

i The emergency coordinator
will notify the regional
administrator and appropriate
state and local authorities
the facility is in
compliance with the above
requirements.

4. These are to be added to Item H) pg.
2409E-61

The report will include:

1. Name, address and telephone number
of owner
2. Name, address and telephone number
of the facility
3. Date, time and type of incident
4. Name and quantity of materials
involved
5. The extent of injuries, if any
6. An assessment of actual or
potential hazards to human health
or environment
7. Estimated quantity and disposition
of recovered material that resulted
from the incident

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(9) (Continued)			The names and telephone numbers of the state and local agencies will be added to item a) pg 2409E-59 as follows: E.P.A. National Response Center 800-424-8802 National Response Center NYS Department of Environmental Conservation 716-847-4590 Niagara County Health Department 716-284-3128 Town Of Niagara - Fire Or Emergency 716-433-4482 Niagara County Sheriff's Department 716-285-5355 Niagara Falls Memorial Medical Center 716-278-4000 CECOS Emergency Response Team 716-284-7113
(10)	Vol. I		See Response 76
(11)	Vol. II	Part A	See Response 86, 89, 91 & 92.